



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7**

11201 Renner Boulevard
Lenexa, Kansas 66219

SENT VIA ELECTRONIC MAIL
RECEIPT CONFIRMATION REQUESTED

Mr. Joe Taglieri, President
Running Foxes Petroleum, Inc.
1690 155th Street
Fort Scott, Kansas 66701
Joe.Taglieri@runningfoxes.com

Running Foxes Petroleum, Inc.
14550 Easter Avenue
Suite 200
Centennial, Colorado 80112

RE: SPCC Inspection
Running Foxes Petroleum, North Stoner Lease
SPCC Inspection Number: SPCC-MO-2020-00016

Dear Mr. Taglieri:

On or about August 21, 2020, a representative of the U.S. Environmental Protection Agency inspected the Running Foxes Petroleum, North Stoner lease facility, located at approximately 37.933783/-94.614497 and 3.75 miles northwest of Richards, Missouri. The inspection was done under the authority of Section 308 of the Clean Water Act, 33 USC § 1318. A copy of the Spill Prevention, Control and Countermeasure (SPCC) Field Inspection and Plan Review Checklist Form is enclosed for your information. The inspection revealed the following deficiencies:

1. Failure to prepare and fully implement a written SPCC Plan for the facility pursuant to 40 CFR § 112.3(a) in accordance with 40 CFR § 112.7 and any other applicable provision of this part.
2. Failure to prepare the SPCC Plan describing the physical layout of the facility with a diagram identifying all the requirements pursuant to 40 CFR § 112.7(a)(3).
3. Failure to address for each container, the type of oil and storage capacity for each container or an estimate of the potential number of mobile or portable containers, the types of oil, and anticipated storage capacities pursuant to 40 CFR § 112.7(a)(3).
4. Failure to provide secondary containment for portable storage containers and the production wellheads pursuant to 40 CFR § 112.7(c).



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5. Failure to conduct inspections and tests in accordance with written procedures pursuant to 40 CFR § 112.7(e).
6. Failure to implement a SPCC Plan for the facility as required by 40 CFR § 112.3(a) pursuant to the provisions of the regulations for plan implementation at 40 CFR §§ 112.7 and 112.9, including:
 - a. Flowlines and associated appurtenances are not periodically visually inspected and/or tested on a regular schedule for leaks, oil discharges, corrosion, or other conditions that could lead to a discharge, as required by 40 CFR § 112.9(d)(4)(ii);
 - b. Repairs or other corrective action are not made to flowlines and associated appurtenances as indicated by regularly scheduled visual inspections, tests, or evidence of a discharge, as required by 40 CFR 112.9(d)(4)(iii);
 - c. Oil removed or other actions initiated to promptly stabilize and remediate any accumulations of oil discharges associated with the flowlines and associated appurtenances, as required by 40 CFR § 112.9(d)(4)(iv).
7. The Contingency Plan does not comport with the requirements of 40 CFR § 109.

The EPA is presently reviewing the findings of the report to determine your facility's compliance with the applicable statutes and regulations. If it is determined that violations exist, the EPA reserves all rights it may have to take appropriate enforcement action.

If there are any questions regarding this report or actions that you may want to take, please contact me at Aaron.Mark@epa.gov, or (913) 551- 7205.

Sincerely,

Mark Aaron
Oil Pollution Prevention Coordinator
Enforcement and Compliance Assurance Division

Enclosure
SPCC Inspection and Plan Review Checklist Form